

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, ex rel. W.A. DREW
EDMONDSON, in his capacity as ATTORNEY GENERAL
OF THE STATE OF OKLAHOMA and OKLAHOMA
SECRETARY OF THE ENVIRONMENT C. MILES TOLBERT,
in his capacity as the TRUSTEE FOR NATURAL
RESOURCES FOR THE STATE OF OKLAHOMA,

Plaintiffs,

v.

TYSON FOODS, INC.; TYSON POULTRY, INC.; TYSON
CHICKEN, INC.; COBB-VANTRESS, INC.; AVIAGEN,
INC.; CAL-MAINE FOODS, INC.; CAL-MAINE FARMS,
INC.; CARGILL, INC.; CARGILL TURKEY PRODUCTION,
LLC; GEORGE'S, INC.; GEORGE'S FARMS, INC.;
PETERSON FARMS, INC.; SIMMONS FOODS, INC.; and
WILLOW BROOK FOODS, INC.,

Defendants.

Case No. 05-CV-0329 JOE-SAJ

MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE*

COME NOW the separate Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, by their attorneys Rhodes, Hieronymus, Jones, Tucker & Gable, PLLC, and pursuant to LCvR 83.3 move this Court for the admission of John F. Jeske to appear *pro hac vice* in this case as out-of-state counsel for Cargill, Inc. and Cargill Turkey Production, LLC, on the following grounds:

1. As set forth in the Affidavit of John F. Jeske in Support of Admission *pro hac vice*, attached hereto as Exhibit 1, the proposed admittee is an attorney with Faegre & Benson, LLP, in Minneapolis, Minnesota. *See* Exhibit 1, ¶ 1.

2. The proposed admittee is a member in good standing of the State Bar of Minnesota with Minnesota Bar No. 0337304 admitted to practice before all state courts in the State of Minnesota and the U.S. District Court for the District of Minnesota. *See* Exhibit 1, ¶ 3.

4. The proposed admittee understands that, upon admission *pro hac vice*, he shall be subject to the disciplinary jurisdiction of this Court.

5. The proposed admittee understands that admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

6. The undersigned counsel will continue to serve as counsel to Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, in these proceedings.

7. Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court.

WHEREFORE Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, respectfully request that this Court grant this application for out-of-state attorney John F. Jeske to appear *pro hac vice* before this Court on behalf of Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, and enter the proposed Order submitted herewith.

Respectfully submitted,

RHODES, HIERONYMUS, JONES, TUCKER & GABLE, PLLC

BY: s/ John H. Tucker

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ATTORNEYS FOR DEFENDANTS, CARGILL, INC. AND
CARGILL TURKEY PRODUCTION, LLC

CERTIFICATE OF SERVICE

I certify that on the 10 day of October, 2005, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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I also hereby certify that I served the attached document by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

Elizabeth C. Ward
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and

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and

C. Miles Tolbert
Secretary of the Environment
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Oklahoma City, OK 73118

s/ John H. Tucker